

Proposed Stipulation and Order Presentment Date: January 20, 2025 at 12:00 p.m. (EST)
Deadline to File and Serve Objections: January 17, 2025 at 5:00 p.m. (EST)

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re:

Chapter 11

VALDESIA GARDENS HOUSING
DEVELOPMENT FUND CORPORATION,

Case No.: 24-23086 (KYP)

Debtor.

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**NOTICE OF PRESENTMENT OF PROPOSED
STIPULATION AND ORDER PURSUANT TO 11 U.S.C. § 543(d)(1)
EXCUSING STATE COURT RECEIVER FROM PROVISIONS OF
11 U.S.C. § 543(a) AND (b) AND GRANTING RELATED RELIEF**

PLEASE TAKE NOTICE that on **January 20, 2025 at 12:00 p.m. prevailing eastern time**, the attached *Stipulation And Order Pursuant To 11 U.S.C. § 543(d)(1) Excusing State Court Receiver From Provisions of 11 U.S.C. § 543(a) And (b) And Granting Related Relief* (“**Stipulation**”) between the above-captioned debtor (the “**Debtor**”), CPC Funding SPE 1 LLC (“**CPC**”), and Robert A. Abrams, in his capacity as receiver (the “**Receiver**”) for the Property (as defined in the Stipulation), will be presented for signature to The Honorable Kyu Young Paek, United States Bankruptcy Judge, at the United States Bankruptcy Court for the Southern District of New York, 355 Main Street, Poughkeepsie, New York 12601.

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Stipulation shall (a) be in writing; (b) conform to the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Local Bankruptcy Rules for the Southern District of New York the (“**Local**

Bankruptcy Rules”), and all General Orders applicable to Chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York; (c) be filed electronically with the Court on the docket of by registered users of the Court's electronic filing system and in accordance with all General Orders applicable to Chapter 11 cases in the United States Bankruptcy Court for the Southern District of New York (which are available on the Court's website at <http://www.nysb.uscourts.gov>); and (d) be served by **January 17, 2025, at 5:00 p.m., prevailing Eastern Time**, (the “*Objection Deadline*”) in accordance with the Bankruptcy Rules and Local Rules.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed and served, a hearing will be scheduled before The Honorable Honorable Kyu Young Paek, United States Bankruptcy Judge on a date and time to be announced.

PLEASE TAKE FURTHER NOTICE that the ECF docket number to which the filing relates shall be included in the upper right hand corner of the caption of all objections.

Dated: New York, New York
January 8, 2025

Respectfully submitted,

WINDELS MARX LANE & MITTENDORF, LLP

By: /s/ Eloy A. Peral
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